

Exhibit 528

CERTIFIED TRANSLATION

Message

From: Gry Ahlefeld-Engel [/O=TOLDSKAT/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BF08BE88C46F4231A8D5BC823CD20291-W24045]
Sent: 6/4/2019 10:48:44 AM
To: Sofie Nygaard Ekstrøm [sofie.ekstroem@sktst.dk]
Subject: FW: The settlement negotiations and SØIK

From: Steen Bechmann Jacobsen
Sent: 26 February 2019 13:57
To: Per Hvas <PH@skm.dk>
Cc: Gry Ahlefeld-Engel <Gry.Ahlefeld-Engel@SKTST.DK>; Tony Gønge Nielsen <tgn@skm.dk>
Subject: RE: The settlement negotiations and SØIK

Dear Per

We regularly inform SØIK about the progress in the cases, including as well in relation to any settlement possibilities, and provided that the current negotiations should lead to a specific proposal, we will of course coordinate this with SØIK as well. There is, however, no immediate expectation that any settlement in any way will have a spillover effect on the criminal track.

Best regards
Steen

From: Per Hvas
Sent: 26 February 2019 13:55
To: Steen Bechmann Jacobsen <Steen.Jacobsen@SKTST.DK>
Cc: Gry Ahlefeld-Engel <Gry.Ahlefeld-Engel@SKTST.DK>; Tony Gønge Nielsen <tgn@skm.dk>
Subject: The settlement negotiations and SØIK

Dear Steen

Kc Lene Steen from the Ministry of Justice's Police Office called in connection with the status of the civil cases for dividend tax being on the agenda for KU tomorrow.

Lene Steen just wanted to make sure that SKTST involves SØIK in connection with the formation of any potential settlement with the US pension plans in order to ensure that no complications arise in relation to the criminal cases.

I assume that this already has been or is being taken into account in the process.

Best regards Per

With best regards

Per Hvas
Head of Unit
Administration and Audit

Tel. +45 22 410962

Email PH@skm.dk



The Ministry of Taxation
Nicolai Eigtveds Gade 28
DK 1402 - København K

Email skm@skm.dk
URL www.skm.dk

Message

From: Gry Ahlefeld-Engel [/O=TOLDSKAT/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=BF08BE88C46F4231A8D5BC823CD20291-W24045]
Sent: 6/4/2019 10:48:44 AM
To: Sofie Nygaard Ekstrøm [sofie.ekstroem@sktst.dk]
Subject: VS: Forligsforhandlingerne og SØIK

Fra: Steen Bechmann Jacobsen
Sendt: 26. februar 2019 13:57
Til: Per Hvas <PH@skm.dk>
Cc: Gry Ahlefeld-Engel <Gry.Ahlefeld-Engel@SKTST.DK>; Tony Gønge Nielsen <tgn@skm.dk>
Emne: SV: Forligsforhandlingerne og SØIK

Kære Per

Vi orienterer løbende SØIK om fremdriften i sagerne, herunder også i relation til evt. forligsmuligheder, og forudsat, at de nuværende forhandlinger måtte munde ud i en konkret oplæg vil vi selvsagt også afstemme dette med SØIK. Der er dog umiddelbart ingen forventning om, at evt. forlig på nogen måde vil have en afsmittende effekt på det strafferetlige spor.

Vh
Steen

Fra: Per Hvas
Sendt: 26. februar 2019 13:55
Til: Steen Bechmann Jacobsen <Steen.Jacobsen@SKTST.DK>
Cc: Gry Ahlefeld-Engel <Gry.Ahlefeld-Engel@SKTST.DK>; Tony Gønge Nielsen <tgn@skm.dk>
Emne: Forligsforhandlingerne og SØIK

Kære Steen

Kc Lene Steen fra Justitsministeriets Politikontor har haft ringet i forbindelse med, at status på de civilretlige sager om udbytteskat er på dagsordenen for KU i morgen.

Lene Steen ville blot sikre sig, at SKTST inddrager SØIK i forbindelse med udformningen af et evt. forlig med de amerikanske pensionsplaner mhp. at sikre, at der ikke opstår komplikationer i relation til straffesagerne.

Jeg går ud fra, at der allerede er taget - eller tages højde herfor i processen.

Vh Per

Med venlig hilsen

Per Hvas
Kontorchef
Administration og Kontrol

Tel. +45 22 41 09 62

Mail PH@skm.dk



Skatteministeriet

Skatteministeriet/Ministry of Taxation
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I, the undersigned, Julius Holm Nørremark, certify that I am fluent in both the English and Danish languages and that the preceding text in the English language is to the best of my knowledge and belief a true and faithful translation of the attached exhibit, with the bates stamp SKAT_MAPLEPOINT_00000174, in the Danish language.

Copenhagen, 1 April 2025



Assistant Attorney, LL.M.